

LAW OFFICES OF
DRATEL & MYSIWIEC, P.C.
A PROFESSIONAL CORPORATION
2 WALL STREET
3rd Floor
NEW YORK, NEW YORK 10005
TELEPHONE (212) 732-0707
FACSIMILE (212) 571-3792
www.dratelmys.com

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JOSHUA L. DRATEL
AARON MYSIWIEC

ALICE L. FONTIER
LINDSAY A. LEWIS

STEVEN WRIGHT
Office Manager
RYAN DUFFEY
Paralegal

June 21, 2012

BY FACSIMILE [(212) 805-7986]

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: June 21, 2012

Re: United States v. Taylor,
11 Cr. 310 (PGG)

Dear Judge Gardephe:

This letter is in regard the sentencing submission to be filed tomorrow, June 22, 2012, on behalf of Javel Taylor, whom I represent in the above-entitled case. For the reasons set forth below, it is respectfully requested that the Court provide Mr. Taylor an extension until Monday, June 25, 2012, to file his sentencing submission with the Court. It is also requested that the Court provide the government a corresponding extension from June 29, 2012, until July 2, 2012, to file its sentencing submission. These extensions will not otherwise alter the remainder of the schedule in this case, as counsel does not request any additional time to reply to the government's submission, and the sentencing issues will thus be fully briefed by Monday, July 9, 2012, as scheduled. Nor will these extensions necessitate an adjournment of Mr. Taylor's sentencing, currently scheduled for Tuesday, June 19, 2012, at 10:00 a.m. My associate, Lindsay A. Lewis, Esq., has spoken with Assistant United States Attorney Amy R. Lester, who has informed me that the government consents to this application.

The extension for filing of Mr. Taylor's sentencing submission is requested because counsel is awaiting the receipt of an important letter on Mr. Taylor's behalf, and to provide counsel necessary additional time to complete the sentencing submission on Mr. Taylor's behalf.

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Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
June 21, 2012
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Accordingly, it respectfully requested that this Court provide Mr. Taylor an extension until June 25, 2012, to file his sentencing submission, and that the Court provide the government a corresponding extension until July 2, 2012, to file its sentencing submission. As noted above, the government consents to this application.

Respectfully submitted,



Joshua L. Dratel

JLD/lal

cc: Amy R. Lester
Assistant United States Attorney